

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEBRASKA

CHRISTINE R. SAUNSOCI,) Case No.
)
Plaintiff,)
) **COMPLAINT**
v.) (Federal Tort Claims Act)
)
UNITED STATES OF AMERICA,)
)
Defendant.)

For her cause of action against Defendant, Plaintiff Christine R. Saunsoci states and alleges as follows:

1. Plaintiff is a resident of Macy, Nebraska.
2. This is an action for money damages for personal injuries resulting from the negligent acts or omissions of Craig Cleveland, an employee of the government, while acting within the scope and in furtherance of his employment with the Department of Health and Human Services on October 16, 2006.
3. Plaintiff timely filed her administrative claim for the sum of \$750,000.00 damages with the Department of Health and Human Services on or about September 11, 2008. Plaintiff deems the agency's failure to make final disposition of the claim a final denial.
4. This Court has jurisdiction pursuant to 18 U.S.C. §§1346(b) and 2671 *et seq.*
5. On October 16, 2006 at the Winnebago Indian Health Service Hospital, Plaintiff suffered injuries to her person when she slipped and fell in a bathroom.

6. Cleveland had just finished cleaning the bathroom while acting in the scope and course of his employment with the government.

7. Cleveland failed to use due care by, among other things, leaving the floors in a dangerously wet and slippery condition and by failing to place a sign or otherwise provide warning to those who may use the bathroom of the danger presented by the slippery floor.

8. When Plaintiff fell, she suffered a debilitating back injury leaving her with permanent impairment of the soft tissue structures of her spine, chronic pain and mental anguish, future medical expenses, lost wages and a diminished earning capacity.

9. Cleveland's negligence was a direct and proximate cause of Plaintiff's injuries and damages.

Therefore, Plaintiff demands judgment against Defendant for general damages in the amount of \$750,000.00, plus costs.

CHRISTINE SAUNSOCI, Plaintiff,

BY: s/ Clarence E. Mock #15443

Clarence E. Mock #15443

Adam J. Sipple #20557

JOHNSON & MOCK

1321 Jones Street

P.O. Box 3157

Omaha, NE 68103-0157

(402) 346-8856

cmock@johnsonandmock.com

ajsipple@johnsonandmock.com

CERTIFICATE OF SERVICE

I, hereby certify that on August 18, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all parties involved.

s/Adam J. Sipple